

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Vs.

CRIM 04-41 ERIE

JOY LYNN SEXTON

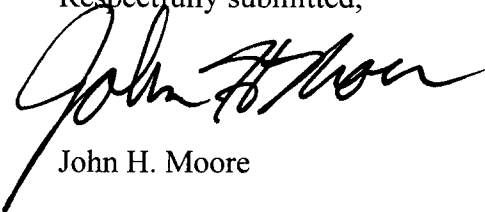
MOTION TO CONTINUE SENTENCE

And now comes the defendant, Joy Sexton, by and through her attorney, John H. Moore, and file this Motion requesting the Court to continue the sentence scheduled in this matter and, in support thereof, states as follows:

1. The defendant is scheduled for sentencing in this matter on August 8, 2005
2. During the pendency of this case the defendant was incarcerated at Erie County Jail as a result of a detainer on a violation of her Pennsylvania State Parole.
3. The defendant served her maximum sentence and was released from custody on June 2, 2005.
4. The defendant's Attorney, John H. Moore has previously scheduled a vacation for the week of August 7- 14, 2005.
5. The defendant is helping to care for her father who is in need of medical treatment likely to extend through the month of August.
6. The defendant is employed and able to support herself and her children during any time period for which the sentence id continued
7. The Assistant U.S. Attorney, Chris Trabolt, has informed the defendant's attorney that the government has no objection to a continuance of the sentence.

WHEREFORE the defendant respectfully requests this Court to continue the sentence in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John H. Moore". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John H. Moore

A COPY OF THIS MOTION WAS SERVED ON THE U. S. ATTORNEY BY HAND
DELIVERY THIS 11TH DAY OF JULY, 2005

A handwritten signature in black ink, appearing to read "John H. Moore". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John H. Moore